



## **LATTICE SEMICONDUCTOR CORPORATION APPLICANT AND EMPLOYEE PRIVACY NOTICE**

**Last updated:** September 13, 2024

### **1. INTRODUCTION**

- 1.1. Lattice Semiconductor Corporation (“the **Company**”) is committed to protecting your privacy and processing your personal data in line with applicable data protection and privacy laws including, but not limited to, the EU and UK General Data Protection Regulations (“**GDPR**”) and the California Consumer Privacy Act of 2018 (“**CCPA**”). California residents may find additional information about their rights in the [ADDENDUM FOR CALIFORNIA RESIDENTS](#). This privacy notice (“**Privacy Notice**”) explains how we protect and process your personal data (including how we collect, use and disclose your personal data) in the context of working with the Company.
- 1.2. This Privacy Notice applies to employees (current and former), independent contractors, agency workers, consultants, job applicants, partners, directors, members, temporary workers, interns, those on work experience, and volunteers (the “**Company Personnel**”). However, this Privacy Notice does not apply to Company Personnel located in China.
- 1.3. It is important that you read this Privacy Notice alongside your contract of employment (or terms of your employment), together with any other notices with regards to data privacy and protection that we may provide to you from time to time, in relation to your personal data and how we process such data.
- 1.4. References in this Privacy Notice to “**Lattice**” / “**we**”/ “**our**” / “**us**”/ the “**Company**” are references to Lattice Semiconductor Corporation and its operating groups, subsidiaries, affiliates and divisions. References in this Privacy Notice to “**you**” or “**your**” are references to Company Personnel.

### **2. IMPORTANT INFORMATION**

- 2.1 We will only process your personal data in accordance with this Privacy Notice, or another purpose compatible with the purposes set forth herein, unless otherwise required by law.



- 2.2 This Privacy Notice supplements other notices and policies and is not intended to override them. This Privacy Notice will not form part of your contract of employment (or contract for services if relevant) and can be amended by the Company at any time.
- 2.3 If any conflict arises between applicable data protection laws and this Privacy Notice, the Company intends to comply with those laws. This notice applies globally. Where there are local law requirements, these are detailed below.
- 2.4 This Privacy Notice applies to all personal data whether it is stored electronically, on paper or on other materials.

2.5 **Purpose of this Privacy Notice**

This Privacy Notice describes:

- what personal data we collect about you and how we obtain and use this;
- the basis on which we collect personal data;
- where we transfer personal data and who we share it with;
- your privacy rights and how the law protects you;
- how long we retain personal data and how we protect it; and
- who you should contact with any questions or concerns.

2.6 **Controller – who we are**

- 2.6.1 A controller alone or jointly determines the purposes for, and the manner in, which any personal data is, or is likely, to be processed.
- 2.6.2 In most cases, the controller of your personal data is Lattice Semiconductor Corporation located at 5555 NE Moore Ct, Hillsboro, OR 97124 and / or the subsidiary or affiliate company by which you are employed or contracted to provide services (acting as independent controllers of your personal data).
- 2.6.3 If you have any questions about this Privacy Notice, including any request to exercise your rights (as set out below), please contact us using the details set out at the end of this Privacy Notice.



2.6.4 We have appointed a data protection officer (“DPO”), who is responsible for overseeing questions in relation to this Notice and compliance with data protection and privacy laws within the Company. Please contact the DPO using the contact details below:

Email: [privacy@latticesemi.com](mailto:privacy@latticesemi.com)  
Mailing Address: Lattice Semiconductor Corp.  
5555 NE Moore Ct.  
Hillsboro, OR 97124, USA  
Attn: Legal Department

### 3. THE PERSONAL DATA WE COLLECT ABOUT YOU

3.1 Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (e.g. anonymous data).

3.2 We collect, use, generate, store and transfer your personal data in the course of your working relationship with the Company, including as part of our recruitment processes. The types of personal data we may collect, subject to applicable laws and requirements, include the following:

- **Contact data:** including email address, address, telephone numbers and next of kin and emergency contact information;
- **Financial data:** including your bank account, payroll records, payment related information and tax status information;
- **Governmental data:** including your tax identification number, driver’s license number, visa information, social security number and passport number, as permitted by law;
- **General data:** including your first name, middle names, maiden name, last name, marital status, title, date of birth, citizenship information, residency, work authorisation and gender;
- **Profile data:** including your usernames and passwords, feedback and survey responses;
- **Work related data:** including your job title or code, languages, work schedule and status (full-time or part-time, regular or temporary), performance evaluations and assessments, phone number and addresses, probation period and employment duration information (including leaving date and reason for leaving);



- **Remuneration data:** including your pay, bonus, pension, benefits information, including information relating to independents or beneficiaries in relation to benefits, and salary deductions/sacrifices;
- **Recruitment data:** including your previous positions, resume, references, application, professional experience and qualifications, and educational history;
- **Health-related data:** including medical conditions as necessary to manage sickness and maternity absence, as permitted by law;
- **Diversity data:** including in relation to gender identification, disability, age, ethnicity, sexuality, religion and social background. Except where such information is necessary to comply with legal obligations, and of which you will be informed at the point of collection, this information will only be collected as permitted by law if you provide it voluntarily or with your explicit consent;
- **Technical data:** including information on your online identifiers such as your internet protocol (IP) address, cookie ID, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you are using;
- **Criminal records data:** including alleged commission of offences in relation to criminal record background checks. In order for us to carry out our legal obligations, as part of the recruitment process, we may ask you to obtain a certificate from the relevant criminal background check agency. Background checks, where permitted, will only be carried out in accordance with applicable laws. You will be informed about these checks in advance if a background check is part of the recruitment or in-employment process; and
- **Other data:** including information you provide to us when attending meetings and events such as dietary requirements and access requirements, and any other information provided to us by you or on your behalf by a third party which may include other special categories of data or sensitive data that are not covered under the health, diversity and biometrics categories, above, such as your political opinions and trade union membership status.

3.3 If you fail to provide up-to-date and complete personal data when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers). Please keep us informed if your personal information changes during your relationship with us.



#### **4. HOW YOUR PERSONAL DATA IS COLLECTED**

- 4.1 We collect your personal data during the course of your relationship with the Company when you provide this directly (e.g. through the application process), from third parties (e.g. former employers and background check agencies and from the trustees or managers of pension arrangements operated by us), we may also collect personal data from publicly available sources (e.g. LinkedIn). We automatically collect technical data about your Company equipment usage, browsing actions, and patterns, and certain information from any personal device that connects to Company networks.
- 4.2 You may be interviewed, audiotaped or videotaped, recorded, or transcribed as part of your relationship with the Company and participation in company events or meetings for legitimate business purposes, including for archival, engagement, marketing, recruitment, or training purposes. We may distribute such materials to other internal, and external audiences, including clients, and will obtain your specific consent where required.

#### **5. HOW WE USE YOUR PERSONAL DATA**

- 5.1 We use your personal data to fulfil the performance of a contract with you (“Performance of a Contract”) and to enable us to comply with our legal and regulatory obligations (“Legal Obligation”). In some cases we may use your personal data to pursue legitimate interests by us or a third party, provided your interests and fundamental rights do not override those interests (“Legitimate Interests”).
- 5.2 With limited exceptions, we do not rely on consent as a legal basis for processing your personal data. Where we rely on consent, we will only do so provided you have given your specific consent to processing. You have the right to withdraw your consent at any time.
- 5.3 The table below summarises the purposes for which the Company uses your personal data. For each purpose, we have set out the legal basis on which we use it.

<b>Purpose</b>	<b>Legal Basis</b>
Recruiting and hiring you as an applicant	Contract Legal Obligation Legitimate Interests
Business management and planning, including account and auditing	Legal Obligation Legitimate Interests
To promote the Company and improve its products or services	Legitimate Interests

Making decisions about your relationship with us including salary reviews, compensation, performance reviews, performance management, promotions and termination	Contract Legal Obligation Legitimate Interests
To investigate alleged dishonest, fraud, theft or improper conduct	Contract Legitimate Interests
Physical and system security, including monitoring activities and fraud detection and reporting	Legal Obligation Legitimate Interests
Background checks, where permitted, to meet regulatory requirements and manage risk	Consent Legal Obligation Legitimate Interests
Remuneration and payroll administration	Contract Legal Obligation Legitimate Interests
Enrolling you in a pension arrangement and other benefits	Contract Legal Obligation Legitimate Interests
Complying with health and safety at work	Legal Obligation Legitimate Interests
To monitor diversity and equal opportunities	Consent Contract Legal Obligation Legitimate Interests
To comply with employment law, immigration law, health and safety law, tax law and other laws which affect us including establishing, exercising or defending legal claims	Legal Obligation Legitimate Interests
Managing sickness absence	Contract Legal Obligation Legitimate Interests
Determining the terms on which you work for us	Contract Legitimate Interests
Gathering evidence for disciplinary or grievance hearings	Contract Legitimate Interests
Ascertaining your ability to work	Legal Obligation Legitimate Interests



To provide information and communication systems and to monitor your use of these to ensure compliance with our IT policies	Contract Legal Obligation Legitimate Interests
To record audio and video calls and meetings	Legitimate Interests
Administering the contract that we have entered into and enforcing its terms	Contract Legitimate Interests
Check you have the legal right to work for us	Contract Legal Obligation Legitimate Interests
To determine whether we need to make reasonable adjustments to your workplace or role because of your disability	Contract Legal Obligation Legitimate Interests
Managing and administering training and development	Contract Legal Obligation Legitimate Interests
To communicate with you or your dependents or beneficiaries	Contract Legitimate Interests
To provide information requested by you	Contract Legitimate Interests
To book and manage travel	Contract Legitimate Interests
Managing and administering business operations	Contract Legitimate Interests
Maintaining business records	Contract Legal Obligation Legitimate Interests

5.4 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you in advance. Where appropriate, we will communicate other purposes to you, to the extent these are not compatible with the original purpose, prior to or at the time of collecting your personal data and, if required by law, seek your consent. We may process your personal data without your knowledge or consent where required by applicable law.

5.5 Please contact the Lattice Legal Department ([privacy@latticesemi.com](mailto:privacy@latticesemi.com)) if you need further details about the specific lawful basis we rely on to process your personal data.



## 6. SHARING YOUR PERSONAL DATA

6.1 We may share your personal data with the parties set out below for the purposes set out in the table above.

- Your personal data may be shared internally within the Company and our group which may include locations outside your home country (including outside the UK and EU) as reasonably necessary for the purposes set out in this Privacy Notice.
- Your personal data may be shared with third parties such as:
  - **Our professional advisers or consultants**, including lawyers, bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services to us;
  - **Clients and customers**; including potential clients and customers;
  - **Service providers** with which the Company has contracted to provide services on our behalf, such as providing payroll and benefits services, hosting our website, conducting marketing activities and surveys, processing transactions, analyzing our sites and performing analyses to improve the quality of our business, sites, products and services; and
  - **Legal and regulatory authorities** to whom we are required by way of court supervised order or similar to make such disclosure.
- We may share your personal data with persons or entities outside the Company if we reorganize or transfer all or part of our business. If a change happens to our business, the purchaser will be entitled to use your personal data in the same way as set out in this Privacy Notice and will assume the rights and obligations regarding your personal data as set out in this Privacy Notice.

## 7. INTERNATIONAL TRANSFERS

7.1 We may on occasion transfer your personal data to a country outside your home country (including outside the UK, the European Economic Area (“EEA”), and/or Quebec) where the data privacy laws may not be equivalent to, or provide the same level of protection for personal data as, the laws in your home country.

7.2 Whenever we transfer your personal data outside your home country, we implement appropriate measures to ensure it remains protected, as required by applicable data protection laws. This may include contractual obligations as well as technical and organizational measures. EU-standard contractual clauses (“SCCs”) are in place within our group. Where appropriate, we have put in place SCCs with our third-party services providers (e.g. where they are processing outside the EEA in a country that does not benefit from an EU Commission adequacy decision).





## **8. PROTECTING YOUR PERSONAL DATA**

- 8.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed, in accordance with applicable data protection laws. We limit access to your personal data to Company Personnel and third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.
- 8.2 After careful selection, we require all our third-party service providers who will process your personal data, to implement appropriate security measures and maintain the confidentiality of your personal data in accordance with applicable data protection and privacy laws. Our third-party service providers must use your personal data for specified purposes, only and in accordance with our instructions. We do not allow our third-party service providers to use your personal data for their own purposes.
- 8.3 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **9. RETENTION OF YOUR PERSONAL DATA**

- 9.1 We will retain your personal data only for as long as necessary to fulfil the purposes for which we collected it, as set out in the table, above and for any periods as required by law. We will also retain your personal data for the purposes of satisfying any legal, accounting, or reporting requirements including bringing or defending legal action or investigations.
- 9.2 Generally, for applicants, your personal data will be deleted upon completion of the application and employment decision process if not selected for employment, unless you specifically request us to retain your personal data for further consideration. If selected for employment, your personal data provided as part of your application will be merged into your personnel file related to your employment.
- 9.3 Under some circumstances, we may anonymize your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

Except as otherwise permitted or required by applicable law, we will only retain your personal information for as long as necessary to fulfil the purposes outlined in this Privacy Notice, such as to satisfy any legal, accounting, or reporting requirements; to



consider you for employment or administer the employment relationship; or as necessary to resolve disputes, defend against claims, or assert or defend the Company's rights.

## **10. YOUR LEGAL RIGHTS**

10.1 Under certain circumstances, and subject to applicable laws, you may have the right to:

- obtain confirmation of whether we are processing your personal data, including to be provided with a copy of your personal data and information regarding how your personal data is being used by us;
- to have any inaccurate or incomplete personal data rectified;
- request that certain personal data held by us is erased. This is also known as the right to be forgotten;
- withdraw your consent to the processing of your personal data where it is being processed by us on the basis of consent;
- request the restriction of or object to the processing of your personal data; and
- request receipt or transmission of your personal data to another company in a machine-readable format.

10.2 You will not have to pay a fee to access your personal data (or to exercise any of your rights), however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

10.3 Applicable laws may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you or we may have destroyed, erased, or made personal data about you anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal data in line with your enquiry we will inform you of the reasons why (subject to any legal or regulatory restrictions).

10.4 If you have any questions about this Privacy Notice, including any request to exercise your rights, please contact us using the details set out at the end of this Privacy Notice. In order to respond to your enquiry, we may request specific information from you to help us confirm your identity.

## **11. CHANGES TO THIS PRIVACY NOTICE**



- 11.1 We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any updates, which will be available on the Company's intranet. Any changes to this Privacy Notice take effect immediately upon this Privacy Notice being posted or otherwise notified to you. The last reviewed date will be indicated at the top of this Privacy Notice.

## 12. CONTACT US

If you have questions about this Privacy Notice or complaints about this Privacy Notice or our privacy practices, or should you wish to exercise your rights, please contact us at:

Lattice Semiconductor Corporation  
5555 NE Moore Ct,  
Hillsboro, OR 97124  
USA  
Telephone: 503-268-8000  
[privacy@latticesemi.com](mailto:privacy@latticesemi.com)

You also have the right to file a complaint against us with your local data protection authority. A list of data protection authorities for the EEA can be accessed [here](#). If you are a resident of Quebec, you may have the right to lodge a complaint with the [Office of the Privacy Commissioner of Canada](#) or [Commission D'accès à L'information du Quebec](#).



## ADDENDUM FOR CALIFORNIA RESIDENTS

This Addendum to the Privacy Notice is intended to comply with the CCPA and its implementing regulations.

Under the CCPA, a business “sells” personal information when it discloses that information to a third party outside of the service provider context for any valuable consideration (monetary or non-monetary). A business “shares” personal information when it discloses personal information to an entity for the purposes of cross-context behavioral advertising. “Personal data” under the CCPA is defined as “personal information.”

### **We do not:**

- **“sell” your personal information;**
- **“share” your personal information for cross-context behavioral advertising;**
- **collect your “sensitive personal information” for the purposes of inferring characteristics about you, and as such, we treat any such information as “personal information” consistent with applicable provisions of the CCPA; or**
- **have any knowledge that we “sell” or “share” personal information collected from you pertaining to individuals under 16 years of age (such as your dependents) as those terms are defined under the CCPA.**

California residents ordinarily have additional rights to opt out of the “sale” or “sharing” of personal information. However, this right is not available to you because we do not and will not “sell” or “share” your personal information. California residents may have additional rights as detailed in the [YOUR LEGAL RIGHTS](#) section.

During the 12-month period prior to the effective date of this Privacy Notice, we have collected some or all of the categories of personal information described above in this Privacy Notice, and have disclosed these categories of personal information to the following categories of entities for a business or commercial purpose:

- **Company companies and affiliates.**
- **Service providers**, such as IT operating system and platform vendors, Human capital SaaS solutions (such as Workday), security vendors, monitoring and data analytics providers, insurance vendors, company banks, payroll processors, other benefits providers, auditors, accountants, and other professional services companies.
- **Public or governmental authorities**, such as regulatory authorities or other third parties in response to legal process or other legal reporting requirements.